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May 15, 2023

VIA ECF

MEMO ENDORSED.

Hon. Ona T. Wang
Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Tracy L. Johnson v. City of New York, et al.
Dkt. No. 23-CV-2407 (LAK) (OTW)
Our File: 611-3305

Dear Judge Wang:

Our law firm, Heidell, Pittoni, Murphy & Bach, LLP, represents defendants the City of New York and New York City Health and Hospitals Corporation in the above-referenced matter. We submit this joint letter with plaintiff's counsel, Joshua Kelner, Esq., to request an adjournment of the Initial Pretrial Conference, which is currently scheduled for Wednesday, May 17, 2023 at 12:30 p.m. (ECF 8).

The parties request an adjournment of the Initial Pretrial Conference because plaintiff has filed an Amended Complaint on May 12, 2023, in which new parties were added and new allegations were made. (ECF 18). The new parties have not yet been served, and defendants require time to review, evaluate, and answer or otherwise respond to plaintiff's Amended Complaint. Further, since new parties were added, the City will need to make representation decisions as to the individual defendants if and when they are served. Therefore, the parties are unable to enter into a Case Management Plan at this juncture.

There have been no previous requests for an adjournment of the Initial Pretrial Conference. The parties propose July 10, 2023 or July 12, 2023 for the rescheduled Initial Pretrial Conference. We thank the Court for its consideration of this request.

Very truly yours,

A handwritten signature in cursive script that reads 'G Apfel'.
Gabrielle Apfel

GA/ep
2730017.1

HEIDELL, PITTONI, MURPHY & BACH, LLP

NEW YORK

CONNECTICUT

WESTCHESTER

LONG ISLAND

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VIA ECF

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Application **GRANTED**. The Initial Case Management Conference previously scheduled for May 17, 2023, is hereby adjourned to **July 13, 2023, at 11:30 a.m.** If the July 13 date does not work for the parties, they shall propose new dates for the conference during the weeks of July 17 or July 24.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'Ona T. Wang', written over a horizontal line.

Ona T. Wang 5/16/23
U.S.M.J.